REMARKS

By the present Amendment, Table 4 has been amended to correct the indication that Polyol D is within the definition of Polyol (C) consistent with the characterization shown in Tables 1-3. The claims, however, have not been amended as applicants respectively maintain that the claims are patentable over the cited prior art of record.

Based on the reasons set forth in the Official Action, applicants believe that the Examiner may not fully appreciate the significance of each of the recited features of the claims and therefore provide the following discussion. As recited in claim 1, one aspect of the present invention relates to a flexible polyurethane foam obtained by contacting a polyol composition (A) comprising 0.5 to 3 parts by weight of a polyetherpolylol (polyol (D)) having a defined amine value and a defined hydroxyl value that is produced by the addition of an alkylene oxide to at least one amine compound represented by defined formula (II) with an organic polyisocyanate. The polyol composition additionally comprises 0 to 99.5 parts by weight of defined polyol (B) and 0 to 99.5 parts by weight of defined polyol (C) with the polyols being in such a ratio that the sum is 100 parts by weight. Claim 4 recites the polyol composition, per se, using the same definitions and amounts.

The first point to recognize is that the defined polyol composition is designed to obtain a flexible polyurethane foam as explicitly recited in claim 1. A flexible polyurethane foam has a significance in the art and is understood to be different from rigid foams. It is for this reason that the flexible polyurethane foam of claim 1 is especially suitable as an automobile seat pad or sound insulating material as recited in certain claims of record. The understanding in the art that flexible polyurethane

foams are distinct from rigid foams is substantiated by reference to the attached Tables of Contents of "Polyurethane Handbook" (see sections 5 and 6) and "Handbook of Polymeric Foams and Foam Technology" (see sections 4 and 5).

The next point to consider is that the claims expressly recite that the polyol (D) be present in an amount of 0.5 to 3 parts by weight and is a polyetherpolylol having a defined amine value and a defined hydroxyl value that is produced by the addition of an alkylene oxide to at least one amine compound represented by defined formula (II). Defined polyol (B) and/or polyol (C) must also be present so that the total amount of polyol is 100 parts by weight.

When following the teachings of the present invention, a flexible polyurethane foam can be obtained that can exhibit reduced volatile amine emission and which has excellent characteristics as shown in the Examples in the Tables starting on page 33. For instance, Examples 2 and 3 in Table 1 illustrate that when the polyol is produced by the addition of ethylene oxide to methyliminobispropylamine (within formula (2) of the independent claims), superior curability is obtained relative to Comparative Examples 2 and 3 that use polyols produced by adding ethylene oxide to ethylene diamine, a common aliphatic amine compound that does not meet formula (2). It will also be noted that Comparative Example 4 uses Polyol J which is also prepared from methyliminobispropylamine, but which has an amine value and hydroxyl number outside of those claimed (see the discussion at the bottom of page 29) and provides inferior results.

With respect to Table 2, a comparison of Examples 5 and 6 shows that when the polyol is produced by adding ethylene oxide to methyliminobispropylamine

¹ Due to the length of the chapters, they have not been attached. However, at the request of the Examiner applicants will provide them.

(Example 5), superior results with respect to closed cell properties, elongation and wet heat compression set can be obtained relative to when the polyol is produced by adding ethylene oxide to 1-(2-aminoethyl)piperazine. Comparative Example 7 in Table 2 illustrates the adverse consequences of too much polyol (D) in the composition (i.e., 3.2%) while other Comparative Examples show the effect of too little polyol (D).

The WO '976 publication does not in any way disclose or teach the defined foam or composition which includes 0.5 to 3 parts by weight of the polyol (D) having the defined amine value and the defined hydroxyl value that is produced by the addition of an alkylene oxide to at least one amine compound represented by defined formula (II). It is noted that the WO '976 publication expressly distinguishes between flexible and rigid foams and in the paragraph bridging pages 8 and 9 states that in the production of "flexible polyurethane foam", the average hydroxyl number should be in the range of 20 to 100 mg KOH/g, preferably from 20 to 70 mg KOH/g. Therefore, it is clear that the WO '976 publication would actually teach away from this aspect of applicants' invention.

With regard to the recited amount of polyol (D) being 0.5 to 3 parts by weight, applicants again note that the evidence of record demonstrates the relevance of this recitation. In contrast, the WO '976 publication discloses that (b2) (the material alleged to meet polyol (D) in the Action) is present in an amount of 5 to 100 parts by weight. The illustrative materials of (b2) are Polyol B at page 22, line 30 having a 1,000 EW which corresponds to a hydroxyl value of 56 mg KOH/g and Polyol F on page 23, line 20 having a 1,700 EW that corresponds to a hydroxyl value of about 33 mg KOH/g. Furthermore, Polyol B is used in an amount of 100% in Table 1, 40 and

50% in Table II, 20, 40.4 and 20.2% in Table IV and 50% in Table VI while Polyol F is used in an amount of 95.5 and 46.75% in Table VII. Therefore, this information, which cannot be ignored, also would lead those of ordinary skill in the art away from the present invention.

Accordingly, without improperly resorting to applicants' own specification, the WO '976 publication would not lead those of ordinary skill in the art to applicants' claimed invention or to an appreciation of the substantial advantages which can be obtained therefrom. Indeed, by following the teachings of the WO '976 publication, one would be led away from invention as defined in the claims.

The further reliance on <u>Falke et al.</u>, U.S. Patent No. 6,087,410, to show the wet heat compression set ratio and density recited in dependent claims 6 and 7 does not remedy the substantial shortcomings of the WO '976 publication. Thus, even assuming for the sake of argument that a proper basis exists for combining the documents in the manner advanced by the Examiner, the claims of record are still patentable over the combination of patent documents.

For all of the reasons set forth above, applicants respectfully submit that the claims of record are patentable over the cited prior art, especially in view of the technical evidence that has been provided, and therefore request reconsideration and allowance of the present application.

Should the Examiner have any questions concerning the subject application, the Examiner is invited to contact the undersigned attorney at the number provided below.

The Director is hereby authorized to charge any appropriate fees under 37 C.F.R. §§ 1.16, 1.17 and 1.20(d) and 1.21 that may be required by this paper, and to credit any overpayment, to Deposit Account No. 02-4800.

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY PC

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Registration No. 28,531

Customer No. 21839 703 836 6620

Date: September 3, 2010

Polyurethane

Chemistry - Raw Materials - Processing - Application - Properties

Edited by Dr. Günter Oertel

With 544 Figures and 121 Tables

With contributions from

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Preface

The "Polyurethanes" volume of the Kunststoff-Handbuch series was selected for translation into English in light of the tremendous pace of technological development and commercial progress since the basic invention of polyurethane chemistry by Prof. Outo Bayer nearly 50 years

Today, numerous building blocks and polymer structures are available to chemists and engineers for the synthesis of polyurethanes by the polyaddition principle. During fifty years of polyurethane chemistry, several polyiscocyanates have become available on a technical scale. Most prominent and important among them are the two high volume product groups: toluene discocyanate (IZDI) and dipheryl methane discocyanate (IZDI). Using iscocyanates and amultitude of polyester- and polyether-polyols, the polyurcthane chemist was able to tallormake thermoste and thermosplastic materials. Understanding the dependance of physical properties on polymer morphology is an invaluable tool in this process. Progress in polymer physics and in polymer analysis has made special contributions towards that understanding.

Because the manufacturer of polyurethane articles converts low-molecular weight raw materials into finished polymers at the production site, we have placed special emphasis on the chemistry of polyurethane raw materials, on process description, and on processing equipment. We sincerely thank the authors of this volume for their efforts. Special thanks go to Mrs. Perra Böckly, as well as to Drs. Brochhagen, Hahn, Rothermel, Schauerte and Uhilg, who integrated the various chapters and formulated the final version of the book.

This volume was not translated by professional translators, but by experts in polyurethane technology at the Mobay Chemical Corporation under the supervision of Dr. J. I.ck. We thank the translating team for their effort, and hope that the technical quality of the English edition compensates for any possible stylistic flaws.

Leverkusen, April 1985

Günter Oertel

Contents

-	_	7	9		7	7	7	20	Q	11	12	12	19	7	3 5	3 5	5 5	19	8	71	7	22	22	CZ	24	24	74	24	56	56	56	27	27	28	78	28	8	53	53	23	30	31
		·	·		·	Ċ																																				
																																							٠			
																												٠						٠								× .
		,										٠		٠							٠			•	٠					٠			٠	•	٠			٠	٠	٠	٠	Perceptions on the physical chemistry of the structure of polyurethanes $(Dr, D. Dieterich$ in cooperation with $Dr. H. Hespe)$
											٠	٠	٠					•			٠	٠		٠		٠	•	٠	٠	٠	٠	•	•	•	٠	٠	•	٠	٠	٠	٠,	ĝ.
			•	₹.	•						•	٠	٠	٠	٠	•	٠	٠	٠	٠	٠	٠	•	•	•	•	٠	٠	٠	٠	٠	٠	٠	•	•	٠	٠	•	٠	٠	٠	ы.
	•		•	įż	-							٠	•	٠		٠	٠	٠	٠	٠	٠	٠	٠	•	•	•	٠	٠	٠	٠	•	٠	٠	٠	•	٠.	•	٠	•	٠	٠.	ᇫ.
	•	٠	٠	8	٠	٠	•	•	•	٠	Ē	٠	٠	•	٠		٠	•	•	٠	٠	*	٠	•	•	•	٠	٠	٠	•	٠	•	•	•	•	٠	•	•	٠	1	•	g.
	•	٠	٠	đ	٠		•	•	•	•	ā	٠	٠	•	. :	=	٠	٠	٠	•	22	٠	٠	٠	•	•	•	٠	٠	•	٠	•	٠	•	•	•	•	•	•	٠	٠,	፭ .
•	•	•	٠	9	٠		•	•	•	•	Ξ.	٠	•	•	٠.	vieterich	•	•	٠	•	systems	•	٠	٠	•	•	٠	٠	•	٠	٠	٠	•	•	٠	•	•	,	•	٠	•	
•	•	٠	٠	E	•	•	•	•	•	•	7	•	٠	•	•	: ::	•	•	•	•	š	•	•	•	•	•	٠	٠	•	•	•	•	•	•	•	•	•	•	•	٠	•	軍の
•	-	•	٠	듔	•		•	•	ន	•	٠.	٠	•	•	. ;	รั	٠	•	•	•		•	•	•	•	•	•	•	•	•	٠	•	•	٠	•	•	•	,	•	•	•	zh k
•	•	٠	•	ĕ	5	•	•	· vs	E C	•	<u>ē</u>	•	•	•	٠,	₹.	•	•	٠	•	Ĕ		٠	•	•	•		•	•	•	•	•	•	•	•	•	•	•	•	•	•	£ 5
•	•	٠	•	<u>~</u>	g,	•	۵	. 🛱	됞	•	83	•	•	•	• •	7	•	•	٠	•	Ĕ	Ë	•	•	•	•	25	•	•	•	•	•	•	•	•	•	•	•	•	•	•	ొ
•	•	•	•	ĕ	H	•	no	ť	્ર	٠.	ğ	•	•	•	٠,	Ē	•	•	•	•	ğ	i;	•	•	•	•	ž.	•	•	•	•	•	:	:	Ċ	Ċ	O	Ċ	:	Ċ		무포
•		•	•	썧	~.	9	2.1.1 Basic reactions of the isocvanate group	2.1.1.1 Addition of nucleophilic reactants	Self-addition reactions of isocyanates	•	Important Building Blocks for Polyurethanes (Dr. W	•	•	•			•	•	•	•	Completely reacted one-component	Reactive one-component systems	•	•	_	63	2,4.1.1 Emulsifier-containing dispersions	•		•	•	•	Ċ	:	·	•	2.4.7.1 Applications for external use	Ċ	Ċ	Ċ	•	Perceptions on the physical chemistry of the structure $(Dr, D$. Dieterich in cooperation with $Dr. H. Hespe$
	The Development of the Polyurethanes	•	•	83	_	Chemical Principles (Prof. Dr. E. Grigat)	<u>د</u> ه	1	9	:	5			:	•	Preparation Methods for Polyurethanes	:	•	•	Ċ	Ň	Ħ	S	:	Recent Developments (Dr. D. Dieterich)	Aqueous polyurethane dispersions	isi	:		S							펂				ž,	23
•	121	٠	•	ě	à	Ġ	па	Ħ	23	•	素	Ċ		Ċ		g	:	·	•		ĕ	즫	en		9	.E	-C)		2	ĕ							Ę				ij.	亞曼
	귱	83	·	5	~£	tri	3	, 'a	, õ	Formation of polyurethanes	9					ឌ			22		Ö	g.	2.3.2.3 Two-component systems	Aqueous two-phase systems	ë	မ္မ	⊒	2.4.1.2 Ionomer dispersions	2.4.1.3 Non-ionic dispersions	2.4.1.4 Properties of dispersions							×				Mixtures with other polymers	g 5
	Ħ	ğ	·	Ę	200		8	i S	ದ್ದ	뮵	Ξ					₹.		53	2,3,1,2 Prepolymer process		ğ	E	, is,	E	q	ξij	-5	.0	.E	ğ							6			Organo-mineral systems	ᆼ.	ğ .5
	-3	∄		Ξ	Ğ	Ä		2	ě	뒾	æ				- 7	0		2.3.1.1 One-shot process	Š		퓛	S	5	S	a	9	뀰	2	ğ	ਚੌ							چ	ä		ള	ъ.	뎕턚
Ē	ã,	띩		.멀	r.;	٧.	Ę,	٥	멸	Ě	S				. '	<u>.</u>	Solvent-free reactions	ខ្ព	Д.	Reactions in solution	Ĕ	설	5	93	÷.	ъ	8	Sp	÷	of						Medical applications	2	Ď,		Š	윤.	<u> </u>
E (2)	2	至		틞		2	<u>_</u>	٥	- 2	Š	ತ					₫.	¥	τ <u>.</u>	5	품	운	9	Ġ	SE	7	귱	5	₹	Ω.	83				Aqueous solutions		5	.5	2		7	5	\$ 8
≥ ≥	-	8	占	A	à	=	S		P	ŭ	æ				٠,	£	ě.	2	놀	Ö	Ę	ķ	8	검	: £	Ħ	1	눥	吕	÷				÷		ន	Ħ	ïä	S	ä	5	검증
G g.	2	စ္	Ę,	ĭ	Š	કુ	8	Ξ	Ř	ō	알					ĕ	=	Ž,	쥖	S	ď	.E	Ä	δ	, E	충	'풉	병	Ξ.	8		Microcapsules	٠	큳		굺	Ĕ.	Ĕ	Matrix foams	.를	````	2. 표
	딣	#3	곀	.5	5		4 7	9	1	Ģ	:5	ន				믕	ត្ត	Ĕ	5	-=	ö	8	×	Ξ	Ε	ຸຊ	Ē	Ē	ē	입		S	20	S	Poromerics	g,	ď	Ξ	ç	Ħ	83	∓ ન્ડ
- P	ă	õ	Ų	Ş	124	.ĕ	83	A	Š	.;	Ŧ	121		Diamines	છ ;	ጀ '	Ξ.	O	۵.	Ë	O			S	,0	្តន	Щ	ĭ	74	Δ,	3	4	Hydrogels	üS	- 5	긑	⋖	⋖	.≚	잂	Ĭ	2 2
# A	양	ᡖ	Ď,	준	-5	Æ		-	. 4	na	æ	ह	중.	∄:	ĕ	Œ	9	٦:	Ç	٠ĕ	7	S	ų,	8	8	8	۲.	d	ιj	4.	æ	ŏ	5	8	텵	Ÿ.	Ξ:	Ğ	井	ga	×	E E
92 N	ંટ	끈	-	-	.5	-	. 5		: =	볉	Ħ	Š	<u>~</u>	4	폋.	음.	Ž.	Ξ.	Ξ.	ŭ	23	3.2	2.	Ř	۵,	Ē	<u>,</u>	7.	7.7	7.	Powders	₽.	ď	2	. <u>ដ</u>	В	4.		ž	ď	₹	<u>5</u> 2
# .E	5	Λä	<u>.</u> ظ	30	e	.≌	Ě	7	2.1.1.2	Щ	13	ž	Polyols	Ά.	Additives	ra.	လ	7			2.3.2.1	2.3.2.2	7	₹	-	₹		તં	ď	ď			H				તં	ri		_	~	40
事品	H	~	છ	7	ä	Ę	-			4	g	Α.	C)	m,	4.	ъ	:			d				m	봈	-					ď	'n	4.	Ś	ø	~			00	ď	×.	ខ្ល
.e	,ä	ņ	9	.걸	Ö.	ŗ	-			2.1.2	Ħ	2.2.1 Isocyanates	2.2.2	223	2,2.4	ឌ	2,3.1			2.3.2				2.3.3	్ల	2.4.1					2.4.2	2.4.3	2.4.4	2.4.5	2.4.6	2.4.7			2.4.8	2.4.9	2.4.10	ē 5
\$ 7	-	-	Ē	ä				ı		~		~	N	CI (7			N				N							(1	C	"	CA	C	(1		•	14			
Polyurethanes and their Market (Dr. R. Hirtz, Dr. K. Uhlig)	1.1	1.2 The Market of the Polyurethanes	Reference list for Chapter 1	Chemical and Physical-Chemical Principles of Polyurethane Chemistry	(Dr. D. Dieterich, Prof. Dr. E. Grigat, Dr. W. Hahn)	2	i				2.2				- 1	7.3									2.4																	2.5
			_	~		•					٠.																															
•				. ,																																						

Contents

3 Raw Materials

 $\overline{\mathsf{x}}$

3.12

	3.3.1.2 Polyol prepolymers
* * * * * * * * * * * * * * * * * * * *	3.3.1.3 Storage, transport, handling
	3.2. Conversion products of polyspocyanates
	Dolinescensiates with martine incommunity and
· war no no	
	3.3.2.6 Fatty acid-modified isocyanates
	3.3.3 High-molecular weight polyurethano-polyols
	3.3.3.1 Solid materials
••	
×	
	Reference list for Chapter 3.3
	rials
F g and T days	3.4.1 Catalysts
•••	3 4 1 2 Catalyets for NOONYOn-resortions
*** ***	2.4.1.2 Catalysts 101 11CO/INCO-Leaching
-	3.4.3 Cross-linkers/chain extenders
	3.4.3.1 Alcohols
	3.4.3.2 Amines
	3.4.3.3. Special cross-linking principals
	3.4.4 Surfactans
•	
******	3.4.2 From etabilitzers
	3443 Cell remisters
• .	7.7.7
	5,4.5 blowing agents
	3.4.5.1 Chemical blowing procedure
٠,	'n
	3.4.6 Additives for flame retardance
	3.4.7 Fillers
	•
	3.4.9 Mold release agents
	3.4.10 Biocide addition agents
	Handling, storage, trans
	Reference list for Chanter 3.4
•	3.5 Industrial Hygiene of PII Raw Materials (Prof. Dr. W. F. Diller)
	3.5.1 Polypols and polyol formulations
	3.5.2 Isocvanates
	3 5 2 Chronic exposure to isocyanate
	5,5,2,4 Cuitonic exposure to isocyanate

Ħ

Contents XIII	5.2.3 Properties	5.4.1 Production 5.4.1.1 Raw materials and production methods 5.4.1.2 Processing technology 5.4.2 Properties 5.4.2.1 Mechanical properties 5.4.2.2 Damping properties 5.4.3.1 Protective paddings 5.4.3.1 Protective and a productives 5.4.3.2 Energy management foams 5.4.3.4 Floor mats 5.4.3.5 Miscellaneous applications 6.4.3.5 Miscellaneous applications	6 PU Rigid Foam (Dr. FK. Brochhagen, Dr. W. Dietrich, G. Gabrysch, Dr. K. J. Kraft, Dr. R. Kubens, Dr. G. Jow, Dr. R. Zölliper)	
	1. Contents 3.5.3. Additives 3.5.3.1 Catalysts 3.5.3.2 Crosslinkers 3.5.3.3 Blowing agents and solvents 3.5.3.4 Other additives Reference list for Chapter 3.5 116	Polyurethane Processing 117 4.1 Basics 117 4.2 Design Principles for Polyurethane Processing Equipment 120 4.2.1 Comparison of the metering and mixing machine systems 120 4.2.2 Comparison of the plant systems 124 4.3.2 Lepso of the Polyurethane Processing 129 4.3.3 Delivery and storage of the raw materials 129 4.3.3 Metering 134 4.3.4 Mixing 155 4.3.5 Pouring 155	4.3.6 Process Controls	(Dr. H. A. Freitag, Dr. G. Hauptmann, Dr. K. Recker, Dr. M. Roegler, Dr. H. Schäfer, Dr. R. Volland) 5.0 Introduction (Dr. G. Hauptmann) 5.1 Slabstock Foams (Dr. M. Roegler) 5.1.1 Production of slabstock foams 5.1.1 Machines for the production of slabstock foams 5.1.1.2 Process description 5.1.1.4 Fabrication of slabstock foams 5.1.1.5 Curing and storing of slubstock foams 5.1.1.5 Utilization of cutting scrap 5.1.1.6 Slab foam systems and their manufacturing formulations 5.1.1.5 Utilization of cutting scrap 5.1.1.5 Slab foam systems and their manufacturing formulations 5.1.2 Mattresses 5.1.3 Applications for slabstock foams 5.1.3 Applications for slabstock foams 5.1.3 Applications for slabstock foams 5.1.3 Applications application 5.1.3 Hearthe foams 5.1.3 Hearthe foams 5.1.3 Packaging 5.1.3 Household goods 5.1.3 Products for backing 5.2.2 Products for backing 5.2.1 Products for backing 5.2.2 Products for backing 5.2.2 Production 5.2.3 Production 5.2.3 Production 5.3.4 Percept Backing 5.3.5 Production 5.3.5 Production 5.3.6 Household goods 5.3.7 Products for backing

V Contents	Contains
	6.5.3 Technical insulation
6.2.7.1 Two-component in situ foam	
	lings spil
6.3 Properties of PU Rigid Foam (Dr. R. Zöllner)	6.5.3.1.2 Preinsulated pipes
	6.5.3.1.3 Pour-in-place foam
y determination	
6.3.1.3 Cell structure	6.5.3.2.2 Low temperature range
6.3.2 Mechanical properties	
angth	
6.3.2.4 Effect of heat and time on properties	6.5.5.1 Refrigerated vehicles
re	rtation of special products
	ing of cavities
6.3.5.2 Effect of the cell gas	orage holds in fishing boats
6.3.5.4 Effect of moisture	
	6.5.7.1 Direct encapsulation
of expansion	ction in vehicles
6.3.9 Combustibility	
6.4 Relationship between Production Methods and Properties	6 5 8 1 Rigid polyurethane foams for horticulture
(Dr. W. Dietrich, Dr. R. Zöllner)	
ously produced laminated boards	6 5 8 Furnitue
:	ozolon
laminated boards with facers	
	Surrounding Strata (Dr. R. Kubens)
one side	6 6 1 Consolidation 31
both sides	tridge process
ndwich elements	6 6.12 Injection process
	Reference list for Chapter 6
	•
or district heating	T. D. L Internal Chin Doom
	/ Polyhremade minegrat somm
	(Dr. H. Kleimann, Dr. U. Knipp, Dr. E. Metsert T, Dr. H. Schafer,
6.5.1 Refrigeration technology and appliances	, Dr. n. Inomus, Dr. Ch. rever, Dr. Lr. rever,
6.5.1.2 Commercial display cases	7.2 Production Technology (Dr. U. Knipp)
in-coolers	decinique
0.0.1.1.2 Water materials	
	7.2.2.2 Molds
	7.3 Figxible Polyurchane integral and realis
rete	7.3.1 follyemen toams (z.c., recer)
ted insulation	7.2.1.2 Demandias
	7.2.7 Elevithe Adjuster (Or F. Mojeert #)
6.5.2.7 One-component foam from pressurized containers	יייייייייייייייייייייייייייייייייייייי
סיביל דוכון סיבור זיסמים דוכון סיבור (סיבור ליביני)	

315 318 318 318 320 320 323 325 325 325 325

Contents

Contents

8.2.2.7 Calendering 8.2.2.8 Bonding/Welding 8.2.3. Properties (Dr. W. Goyert) 8.2.3.1 Heat resistance 8.2.3.2 Low temperature behavior 8.2.3.3 Dynamic characteristics 8.2.3.4 Gas permeability 8.2.3.5 Chemical resistance 8.3 Special Elastomers 9.3.5 Chemical resistance 9.3.5 Chemical resistance 9.41	8.1.3 Millable urethane gum (Dr. W. Kallert) 8.3.1.1 Production 8.3.1.2 Pulcanization systems 8.3.1.3 Particulars for processing 8.3.1.4 Properties of the vulcanizate 8.3.1.5 Water crosslinking 8.3.2. Polyurethane prepregs (Dr. K. Recker) 8.3.2.1 Production 8.3.2.2 Processing of polyurethane prepregs 8.3.2.3 Properties 8.4.4 Applications in the automobile sector 8.4.4 Applications in the automobile sector 8.4.1.1 Wheel joints, tie rod joints, axle strut joints	8.4.12 Hydropneumatic suspension system 8.4.1.3 Supplementary spring from cellular PU elastomers 8.4.1.4 Exterior auto body parts 8.4.1.5 Polyurchtane cast tires 8.4.2 General erginecring applications 6.4.2.1 Rollers and roll covers 8.4.2.2 Milling rolls 8.4.2.4 Drive components 8.4.2.5 Wear resistant elements 8.4.2.6 Wear resistant elements 8.4.3.6 Applications in the construction industry 8.4.3.1 Sport and track surfaces 8.4.3.1 Formwork mats	8.4.4 Applications in the electrical area 8.4.5 Applications for the shoe industry 8.4.5.1 Shoet utside covers 8.4.6.2 Sport shoe soles 8.4.6.1 Films 8.4.6.2 Tubes Reference list for Chapter 8 9 Determination of the Composition and Properties of Polyurethanes (J. Hoffmann, H. Ostromow, F. Prager, Dr. H. M. Rothermel, Dr. J. Vogel) 9.0 Introduction (Dr. H. M. Rothermel) 9.1 Determination of the Chemical Composition (H. Ostromow, Dr. J. Vogel)
7.3.2.1 Production 333 7.3.2.2 Properties 333 7.3.2.2 Properties 333 7.3.3.2 Part production (Dr. H. Schäfer) 335 7.3.3.1 Pats shocts 335 7.3.3.2 Pates agents 336 7.3.3.3. Release agents 336 7.3.3.4 Post-finishing 337 7.3.3.5 Coloring 337	xble integral foams (Dr. 41) Schuyes, Constitution of and other technical applications (try (try (from try (fremann) (fremannn) (fremannnn) (fremannnn) (fremannnnn) (fremannnnnnnnnnnnnnnnnnnnnnnnnnnnnnnnnnnn	oyert, HG. Hoppe, Dr. W. Kallert, 21, Dr. K. Schauerte, Dr. W. Wellner) anter) od tuction and processing systems s anc cast elastomers	8.1.2 Casting Kesins 388 8.1.2.1 Electrical Sector (Dr. F. Einhard) 402 8.1.2.2 Joint scalants (Dr. W. Wellner) 405 8.2.1 Production (Dr. W. Goyert) 406 8.2.1 Laboratory preparation 406 8.2.1.1 Laboratory preparation 406 8.2.1.2 Technical production 407 8.2.1.3 Mixtures with other materials 407 8.2.2.1 Preparation of the pellets 407 8.2.2.1 Preparation of the pellets 407 8.2.2.2 Post-restant of the finished parts 407 8.2.2.3 Use of scrap and regind 408 8.2.2.5 Injection molding 408 8.2.2.5 Injection molding 408 8.2.2.5 Extrusion 410

8 Solide Polyurethane Materials

450 450

480 481 482 483 484 484 485 486 487 488 488 488 488 488	489 490 491 493 494 497 497 497 690 500 500 500 503	510 510 511 511 511 512 513 513 523 523 525 525 525 526 527 527 527 527 527 527 527 527 527 527
9.2.11.1 Light and weather exposure 9.2.11.2 Determination of the stability against gasos, liquids, and solids 9.2.12 Determination of friction and abrasion performance 9.2.13 Determination of the thermal conductivity rating 9.2.14 Determination of water vapor permeability 9.2.15 Determination of water uptake 9.2.16 Determination of the acoustical properties 9.2.17 Determination of electrical and dielectric properties 9.3 Surtability Determination through End-Product Testing (J. Hoffmann) 9.3.1 Simulation of day-to-day use 9.3.2 Measurement methods for end-product resting 9.3.2.1 Dimensional stability, determination of part weights and dimensions 9.3.2. Mechanical requirements 9.3.3. Examples of end-product testing	9.3.3.7 Testing of PU shoe soles 9.3.3.2 Testing of automobile seals 9.3.3.2 Esting of automobile seals 9.3.3.4 Automobile headliners 9.3.3.5 District heating systems 9.4.1 Cenerally used laboratory procedures 9.4.1 Generally used laboratory procedures 9.4.3 Mining applications 9.4.4 Transportation applications 9.4.5 Furniture and furnishing 9.4.6 Construction applications area 9.4.5 Construction materials 9.4.6.1 Construction materials 9.4.6.2 Construction materials 9.4.6.2 Construction feements and special constructions 9.4.7 Other Irre-related factors Reference list for Chapter 9	10 PU Paints and Coatings (Dr. H. Koch, Dr. G. Mennicken, Dr. F. Müller, Dr. H. Toepsch, Dr. H. Träubel, W. Wieczorrek) 10.1 Paints and Coatings (Dr. G. Mennicken, W. Wieczorrek) 10.1.1 Solvent-containing, ambient-cure reactive coatings 10.1.1 Two-component PU coatings 10.1.1 Amanufacturing 10.1.1 Amanufacturing 10.1.1 Properties of the coating 10.1.2 Solvent-borne non-reactive polyurethanes 10.1.3 Solvent-borne one-component stoving lacquers 10.1.4 Solvent-borne, air-dry coatings 10.1.5 Solvent-borne one-component stoving lacquers 10.1.5 Solvent-borne one-component coatings 10.1.5 Solvent-borne one-component coatings 10.1.5 Solvent-borne one-component coatings 10.1.5 Solvent-borne one-component coatings 10.1.5 Solvent-free paints and coatings 10.1.5.1 Puro-component coatings 10.1.5.2 Pur modified epoxy systems
and the second s	The second secon	,
450 450 451 451 451 452 453 453 454 454 454 455	455 456 461 462 462 463 464 465 465 466 466 467 466 467 468 469 469 470	470 471 473 474 475 476 476 476 476 476 477 478 478 479 480
Detection methods and elucidation procedures 9.1.1.1 Thin layer chromatography 9.1.1.3 Gas chromatography 9.1.1.4 Infrared spectroscopy 9.1.1.5 Nuclear magnetic resonance spectrometry 9.1.1.5 Hydrolytic methods 9.1.1.5 Hydrolytic methods 9.1.2.1 Sicoyanates 9.1.2.2 Residual NCO groups 9.1.2.2 Determination of free monomeric isocyanates 9.1.2.1 Polyesters 9.1.2.2 Polyesters 9.1.2.5 Polyethers 9.1.2.6 Polyethers 9.1.2.6 Chain extenders	9.1.2.8 Auxiliaries and additives Determination of Material Properties (Dr. H. M. Rothermel) 9.2.1 Standardized test methods 9.2.2 Test specimen preparation 9.2.4 Determination of linear dimensions 9.2.5 Determination of density/Apparent density 9.2.5 Determination of the reaction of open and closed cells in foams 9.2.6 Determination of the mechanical properties in short term experiments 9.2.7 Teralie experiments 9.2.7.1 Tensile experiments 9.2.7.3 Compression experiments 9.2.7.4 Hardness determination 9.2.7.5 Flexural experiments 9.2.7.6 Edwar experiments 9.2.7.7 Determination of the modulus of elasticity	9.2.7.8 Short duration experiments on core compounds 9.2.9 Impact experiments 9.2.8 Determination of the mechanical properties in long-term experiments under static load or constant deformation 9.2.8.1 Compression set/kensile set 9.2.9 Determination of the mechanical properties under periodically varying load of deformation 9.2.9.1 Dynamic fatigue experiments on rigid integral skin foams 9.2.9.2 Dynamic fatigue experiments on rigid integral skin foams 9.2.9.2 Dynamic fatigue experiments on flexible foams 9.2.9.3 Continuous bending experiments 9.2.9.3 Continuous bending experiments 9.2.10 Determination of the temperature dependence of properties 9.2.10.1 Determination of the temperature dependence of characteristic values 9.2.10.2 Short duration experiments at various temperatures 9.2.10.4 Determination of the softening temperature 9.2.10.5 Dimensional stability in heat and cold 9.2.10.6 Creep pressure experiments as a function of temperature 9.2.11 Investigation of aging performance

Tecrile, Paper and Leather Coating Tecrile, Paper and Leather Coating Tecrile Paper and Leather Coating Tecrile Paper and Leather Coating Tecrile of the Topsorh, Dr. F. Müller) Tolic ocating Tolic o	11.6	10.1.5.4 Oven-dried, solvent-free coatings		11.5.3 Production and processing
r. H. J. Koch, Dr. H. Teepsch, Dr. F. Miller) 530 Gation and the texture of the Purpoducits 531 2.1.1.2 The polymer structure of the Purpoducits 532 2.1.2.2 The polymer structure of the Purpoducits 533 2.1.2.2 The polymer structure of the Purpoducits 533 2.1.2.3 Coating processes 534 2.1.4.4 Painshing of Pu-coatings 534 2.1.4.5 The use for promeric imitation leather 538 2.2.1.4 Dolyaddition using dispersions 537 2.2.1.1 Properties of polymethane films 539 2.2.1.1 Properties of polymethane films 539 2.2.1.2 Working with polymethane films 539 2.2.1.3 Applications for polymethane dispersions for paper sizing 541 paper coating with polymethane dispersions for paper sizing 541 paper coating with polymethane dispersions for paper sizing 541 paper coating with polymethane dispersions for paper sizing 541 paper coating with polymethane dispersions for paper sizing 541 2.2.1.3 Properties of polymethane dispersions for paper sizing 541 2.2.1.3 Properties of polymethane dispersions for paper sizing 541 2.3.2.3 Patent leader 543 2.3.2.3 Patent leader 544 2.3.2.3.2 Patent leader 544 2.3.2.4 Fold finishing 56 2.3.3 Patent leader 550 2.3.3 Patent leader 550 2.3.4 Polymethane 550 2.3.5 Patent leader 550 2.3.5 Patent leader 550 2.3.5 Patent leader 550 2.3.6 Patent leader 550 2.3.7 Patent leader 550 2.3.8 Patent leader 550 2.3.8 Patent leader 550 2.3.9 Patent leader 550 2.3.1 Patent leader 550 2.3.2 Patent leader 550 2.3.3 Patent leader 550 2.3.3 Patent leader 550 2.3.4 Patent leader 550 2.3.5 Patent leader 550 2.3.5 Patent leader 550 2.3.6 Patent leader 550 2.3.7 Patent leader 550 2.3.8 Patent leader 550 2.3.9 Patent leader 550 2.3.1 Patent leader 550 2.3.2 Patent leader 550 2.3.3 Patent leader 550 2.3.3 Patent leader 550 2.3.4 Patent leader 550 2.3.5 Patent leader 550 2.3.5 Patent leader 550 2.3.7 Patent 100 2.3.8 Patent leader 550 2.3.8 Patent leader	In the content (string) 550 11.63. Availlable 550 11.63. Availlable 550 11.63. Availlable 550 11.64. Addition to the critical southern 551 11.74. Addition 550 11.64. Addition 550 11.65. Addition 550 11.65. Addition 550 11.65. Addition 550 11.65. Addition 550 11.75. Debugging of pleasible 551 11.12. Debugging of pleasible 551 11.13. Debugging of pleasible 551 11.55. Debugging of pleasible	U coatings		
trile treatment (string) State (string) Stat	11.15 A philation Public and the tenter subtraction of the PL-products 52 11 11.17 B reducing to plication 2.1.27 B reducing of placing of the PL-products 52 11.17 B reducing of placing of placing of placing of placing of the PL-products 52 11.17 B reducing of placing of the PL-products 52 11.17 B reducing of placing of the PL-products 52 11.17 B reducing of placing of the PL-products 52 11.17 B reducing of the placing of the PL-products 52 11.17 B reducing of the placing of the PL-products 52 11.17 B reducing r	; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ;		11.6.2 Auxiliaries
2.1.2.1 Selection of the textile substrate 531 2.1.2.2 The polymer siturciure of the PU-products 532 2.1.2.2 The polymer siturciure of the PU-products 533 2.1.2.4 Finishing of PU-coatings 534 2.1.2.4 Finishing of PU-coatings 534 2.1.4.2 Polyaddition using dispersions 534 2.1.4.1 Polyaddition using dispersions 537 2.1.4.2 The use for porometic imitation leather 538 2.2.1.3 Polyaddition using dispersions for paper ceating 538 2.2.1.4 Polyaddition using proper ceating 538 2.2.1.3 Applications for polyurchane films 539 2.2.1.4 Other applications for polyurchane dispersions of paper coating 540 1.2.1.2 Applications for polyurchane dispersions and solutions for paper sizing 541 1.3.2.1 Impregnation and base coating of leather 543 2.3.2.2 Top finish 544 2.3.2.3 Patent leather 544 2.3.2.3 Patent leather 548 2.3.2.5 Patent leather 54 2.3.2.6 Foll finishing 54 4 ecial processes 546 54 54 52.3.2.5 Fatent leather 54 5.3.2.6 Fatent leat	2.1.2. The proposer structure of the PL-producted 522 311.1.1. Footward industry 2.1.2. The proposer structure of the PL-producted 523 312.1. Deciding of plastics 2.1.2. The proposer structure of the PL-producted 524 11.7. Selection of the plant structure of the PL-producted 524 2.1.2. Finding of PL-conting products 524 524 2.1.2. Finding of PL-conting products 524 524 2.1.2. Finding of PL-conting products 524 525 2.1.2. The product of polyured than in obtain 525 525 2.1.2. The product of polyured than in obtain 525 526 2.2.1. A polyured than in obtain 525 527 2.2.1. A polyured 525 527 2.2.1. A polyured 525 527 </td <td>sizing)</td> <td></td> <td></td>	sizing)		
2.1.2.2 Coating processes 2.1.2.4 Finishing of PU-coatings 334 2.1.2.4 Finishing of PU-coatings 334 2.1.4.2 Polyaddition using dispersions 2.1.4.3 The use for perometric imitation leather 337 2.1.4.1 Polyaddition using dispersions 2.1.4.3 The use for perometric imitation leather 338 2.2.1.1 Properties of polyurethane films 2.2.1.2 Working with polyurethane films 339 2.2.1.3 Working with polyurethane films 340 2.2.1.3 Papier tooding 341 342 3.2.2.1 Impregnations of polyurethane dispersions for 343 3.2.2.2 Too finish 344 345 346 347 348 348 348 348 348 348 348 348 349 349 349 340 340 340 340 341 341 341 341 342 343 344 344 344 344 344 344 344 344	11.72 Pecking applications 1.1.73 Conding processes 1.1.74 Conding pr	tion of the textile substrate		11.7.1
2.1.2.4 Finishing of PU-coatings 534 2.1.4.1 Pointeding 534 2.1.4.2 Polyaddition using dispersions 536 2.1.4.3 The use for poromeric imitation leather 538 2.2.1.4 Polyaddition using dispersions 538 2.1.4.2 The use for poromeric imitation leather 538 2.2.1.1 Properties of polyurethane dispersions 539 2.2.1.2 Working with polyurethane dispersions 539 2.2.1.3 Applications for paper coating 540 2.2.1.4 Other applications of polyurethane dispersions and solutions for paper sizing 541 3.2.2.1 Murchane dispersions and solutions for paper sizing 542 2.3.2.1 Impregnation and base coating of leather 543 2.3.2.2 Top finish 543 2.3.2.3 Poli finishing 544 4.3.2.4 Fold finishing 544 4.3.2.5 Fold finishing 554 4.4 ctr 10 550 550 550 66 550 7.3.2.4 Fold finishing 550 8.4 ctr 10 551 9.4 ctr 10 551 9.5 ctr 10 551 10 552 10 553 <td> 1.1.7 & Building in PU-coutings 254 11.1.7 & Building industry </td> <td></td> <td></td> <td>11.7.3 Packaging applications</td>	1.1.7 & Building in PU-coutings 254 11.1.7 & Building industry			11.7.3 Packaging applications
2.1.4.1 Polyaddition using dispersions 2.54	1.1.5 building industry 1.1.5 building 1.1.5 building industry 1.1.5 building 1.1.5	of PU-coatings	_+ .	11.7.4 Clothing industry
2.1.4.1 Polyaddition using dispersions 536 2.1.4.2 Polyaddition in solution 537 2.1.4.3 The use for poromeric imitation leather 538 2.1.4.3 The use for poromeric imitation leather 538 3.2.1.1 Properties of polyurethane films 539 2.2.1.2 Working with polyurethane films 539 2.2.1.3 Applications for food packaging paper 540 2.2.1.3 Applications for food packaging paper 541 3.2.1.3 Applications and solutions for paper sizing 541 3.3.2 Top finish 562 2.3.2.1 Impregnation and base coating of leather 543 2.3.2.2 Top finish 544 3.3.2.3 Patent leather 544 3.3.2.3 Patent leather 544 3.3.3.4 Foil finishing 548 3.3.5 Patent leather 548 3.3.5 Patent leather 548 3.3.6 Foil finishing 548 3.3.7 Top finish 559 3.3.8 Reaction Adhesives 550 3.3.9 and processes 550 3.3.0 and processing 550 3.3.0 and proce	12		+ ++	11.7.6 Building industry
2.1.4.3 The use for porometre imitation learner 538 1.2.1.1 Properties of polyurethane films 538 2.2.1.2 Working with polyurethane films 539 2.2.1.3 Applications for food packaging paper 539 2.2.1.3 Applications of polyurethane dispersions for paper coating paper coating paper coating paper sizing 541 Iyurethane dispersions and solutions for paper sizing 542 inshing paper sizing 543 2.3.2.1 Impregnation and base coating of leather 543 2.3.2.2 Top finish 544 2.3.2.3 Patent leather 544 4.3.2.4 Foil finishing 548 6 secial processes 550 7 and processes 550 8 secion Adhesives 550 9 and processing 552 9 onds 553 1 and processing 553 1 and processing 554 1 and processing 553 2 section Adhesives 553 2 section Adhesives 553 2 section Adhesives 554 2 section Adhesives 554	12 Polymethane (PU) and Isocyanates as Binders 13 Polymethane (PU) and Isocyanates as Binders 13 Polymethane (PU) and Isocyanates as Binders 13 Polymethane (agerations for paper conting 13 14 15 15 15 15 15 15 15	dispersions	- 4	Reference list for Chapter 11 '
1.2.1.1 Properties of polyurethane films 539 2.2.1.2 Working with polyurethane films 539 2.2.1.2 Working with polyurethane films 539 2.2.1.3 Applications for food packaging paper 540 2.2.1.3 Applications of polyurethane dispersions for paper coating paper coating paper coating 541 3.2.1.1 Impregnation and base coating of leather 543 2.3.2.1 Impregnation and base coating of leather 543 2.3.2.2 Top finish 544 4.2.3.2.4 Foil finishing 546 4.3.3.2.4 Foil finishing 546 4.3.3.4 Foil finishing 546 4.3.4 Foil finishing 546 4.3.5 Patent leather 546 4.3.5 Patent leather 546 4.3.5 Patent leather 547 4.3.5 Patent leather 548 4.3.5 Patent leather 549 4.3 Patent leather 549 4.4 Patent leather 549 4.5 Patent leather 540 4.5 Patent l	12.21 Department of pages coulding 253 Pages	for poromeric imitation leather	~ ~	12 Delementons (DI) and Jeorganates as Rinders
2.2.1.1 Properties of polyurethane lims 539 2.2.1.2 Applications for food packaging paper 540 2.2.1.3 Applications for food packaging paper 541 2.2.1.4 Other applications of polyurethane dispersions for paper coating 541 hijurethane dispersions and solutions for paper sizing 542 paper coating 542 phications in tanning, retanning, coloring 543 2.3.2.1 Impregnation and base coating of leather 543 2.3.2.2 Top finish 544 2.3.2.4 Foil finishing 544 4.2.3.2.5 Patent leather 544 2.3.2.6 Top finishing 548 6.2.3.2.7 Foil finishing 548 6.2.3.2.8 Reaction Adhesives 550 1.3.3.2.9 Adhesives 550 1.3.4 Adhesives 550 1.3.4 Adhesives 550 1.3.4 Adhesives 550 1.3.4 Adhesives 550 1.3.5 Adhesives 550 1.3.6 Adhesives 550 1.3.7 Adhesives 553 1.3.8 Adhesives 553 1.3.9 Adhesives 553 1.3.4 Adhesives 553 1	2.2.1.1 Properties of polyurethane limits 359 12.0 Introduction (Dr. K. J. Kraft) 2.2.1.2 Working with polyurethane limits 539 12.0 Introduction (Dr. K. J. Kraft) 2.2.1.2 Applications for food packeging paper 541 12.1.1 Manufacture 2.2.1.2 Applications of polyurethane dispersions for paper skiring 542 12.1.1 Manufacture 1.2.1.2 Applications of polyurethane dispersions and solutions for paper skiring 542 12.1.1 Applications 1.2.2.2 Top finish 543 12.1.2 Properties 12.1.2 Applications 2.2.2.2 Top finish 543 12.1.2 Properties 12.1.2 Applications 2.2.2.2 Top finish 544 12.1.1 Manufacture 12.1.2 Properties 2.2.2.2 Top finish 544 12.2.1 Manufacture 12.2.1 Manufacture 2.2.2.2 Foil finishing 544 12.2.1 Manufacture 12.2.1 Applications 2.2.2.2 Foil finishing 544 12.2.1 Manufacture 12.2.1 Manufacture 2.2.3.2 Foil finishing 544 12.2.1 Manufacture 12.2.2 Properties 2.2.3.2 Properties 548 12.2.3 Manufacture 12.2.3 Properties 2.2.3.2 Properties 553			12 Fulyurchanne (t. C.) and 2003 marked in American (Dr. K. J. Kraft, Dr. R. Kubens, Dr. K. Recker, Dr. HD. Ruprecht, H. I. Sachs)
12.11 Applications for food packaging paper 540 12.11 Bonding of Forest and Agricultural Products (H. 2.2.1.4 Other applications of polyurethane dispersions for paper staing 541 12.11 Manufacture 12.11.11 Manufacture 12.11.12 Properties 542 12.11.13 Applications of paper staing 542 12.11 Manufacture 12.11.13 Applications 543 12.12 Manufacture 12.12 Manufacture 543 12.12 Manufacture 12.12 Manufacture 544 12.12 Manufacture 12.12 Manufacture 12.12 Manufacture 12.12 Manufacture 12.12 Manufacture 12.12 Manufacture 12.12 Properties 544 12.12 Properties 12.13 Applications 12.13 Applications 12.21 Manufacture 12.21 Manufacture 12.21 Manufacture 12.21 Manufacture 12.21 Manufacture 12.21 Applications 12.22 Properties 12.23 Properties 12.24 Properties	12.13 Applications for food packaging paper 540 12.18 Bonding of Forest and Agricultural Products (II.1.1. Sechs) 12.11.1 Abplications for food packaging paper 541 12.11.1 Adminstrate (Increase paper coating paper coating 542 12.11.1 Adminstrate 12.11.1 Adminstrate 12.11.1 Adminstrate 12.11.1 Applications for paper script 542 12.11.1 Adminstrate 12.11.1 Adminstrate 12.11.1 Adminstrate 12.11.1 Applications 12.11.1 Applicat	rsions		12.0 Tutroduction (Dr. K. J. Kraft)
12.1.1 1	12.1.1 The bonding of forest products 12.1.1 The bonding of forest products 12.1.1 Administrations of polywrethane dispersions for 41 12.1.1 Administration 12.1.1 12.1.		0	Bonding of Forest and Agricultural Products (H.
paper coadulg 541 lyurethane dispersions and solutions for paper sizing 542 sylvations in tanning, retanning, coloring 543 1.3.2.1 Impregnation and base coading of leather 543 2.3.2.1 Impregnation and base coading of leather 544 2.3.2.3 Patent leather 544 2.3.3.3 Patent leather 543 2.3.3.3 Patentian leather 543 2.3.3 Patentian leathe	1.1.1.1 Propertions and solutions for paper string 544 1.1.1.1 Properties 1.1.1.1 Properties 1.1.1.1 Properties 1.1.1 Properties 1.1.1.1 Prope	٠.		12.1.1 The bonding of forest products
pilications in tanning, retanning, coloring 542 1.3.2.1 Imprognation and base coating of leather 543 1.3.2.2 Top fulsish 544 1.2.3.2.3 Pattent leather 544 1.2.3.2.4 Fold finishing 544 1.2.3.2.4 Fold finishing 544 1.2.3.2.4 Fold finishing 544 1.2.3.2.4 Fold finishing 544 1.2.3.2.5 Fold finishing 544 1.2.3.2.6 Fold finishing 544 1.2.3.2.7 Fold finishing 544 1.2.3.3.4 Fold finishing 544 1.2.3.3.4 Fold finishing 544 1.2.3.3.4 Fold finishing 544 1.2.3.3.4 Fold finishing 548 1.2.3.1 Fold finishing 548 1.2.3.1 Fold finishing 548 1.2.3.1 Fold finishing 548 1.2.3.2 Fold finishing 548 1.2.3.3 Fold finishing 548 1.3.3.3 Fold finishing 549 1.3.3.4 Fold finishing 540 1.3.3.4 Fold fini	12.1.3 Applications 542 12.1.3 Applications 12.1.3 Properties 12.1.3 Pro	: :		12.1.1.2 Properties
nishing 12.12 labrations in tanning, retanning, coloring 543 2.3.2.1 Impregnation and base coating of leather 543 2.3.2.2.1 Top funish 544 2.3.2.2.2.2.2.3.2 Patent leather 544 2.3.2.2.3.2 Patent leather 544 2.3.2.4 Fold finishing 544 2.3.2.4 Fold finishing 544 2.3.2.5.2 Patent leather 544 2.3.2.4 Fold finishing 544 2.3.2.5.2 Patent leather 544 2.3.2.5.2 Patent leather 544 2.3.2.2 Patent leather 544 2.3.2.3 Patent leather 544 2.3.2.4 Fold finishing 544 2.3.2.5 Fold finishing 544 2.3.2.6 Fold finishing 548 2.3.2.7 Fold finishing 548 2.3.2.8 Fold finishing 544 2.3.2.1 Fold finishing 544 2.3.2.2 Fold finishing 544 2.3.2.3 Fold finishing 544 2.3.2.4 Fold finishing 544 2.3.2.2 Fold finishing 544 2.3.2.3 Fold finishing 544 2.3.2.4 Fold finishing 544 2.3.2.7 Fold finishing 544 2.3.2.2 Fold finishing 544 2.3.2.3 Fold finishing 544 2.3.2.4 Fol	12.12 Bonding of agricultural products 12.12 Bonding of agricultural products 12.12 Impregation and base coating of leather 543 12.12 Impregation and base coating of leather 543 12.12 Impregation and base coating of leather 544 12.12 Bonding of other Products (Dr. H-D. Ruprechi, H. I. Starls) 12.12 Rubber 12.2.11 Rubber 12.2.11 Rubber 12.2.12 Rubber 12.2.12 Rubber 12.2.13 Applications 12.2.21 Rubber 12.2.13 Applications 12.2.22 Rigid polymethane foam strap 12.2.22 Rigid polymethane foam strap 12.2.23 Applications 12.2.23 Appli			12.1.1.3 Applications
12.2 Impregnation and base coating of leather 543 12.2 12.3 12.2 12.3 12.2 12.3 12.2 12.3 12.2 12.3 12.4 12.3 12.4 12.3 12.4	12.12.1 Improgration and base coating of leather 543 12.12.2 Properties 12.12.2 Applications 12.12.3 Applications 12.12.3 Applications 12.12.3 Applications 12.2.3.2 Patent leather 544 12.2.1 Patent leather 545 12.2.1 Patent leather 546 12.2.1 Patent leather 546 12.2.1 Patent leather 546 12.2.1 Patent leather 546 12.2.1 Patent leather 548 12.2.2 Patent leather 548 12.2.3 Patent leather 548 12.2	Applications in tanning, retanning, coloring	2 6	Bonding of agricultural
2.3.2.2 Top finish 2.3.2.3 Patent leather 5.44 2.3.2.4 Foil finishing 5.44 2.3.2.4 Foil finishing 5.45 5.46 5.46 5.47 5.2.1 Foreign processes 5.46 5.48 5.48 5.48 5.48 5.48 5.48 5.48 5.48	2.3.2.2 Top finish \$43 12.1.2.3 Applications 2.3.2.4 Folf finishing \$44 12.2 Bonding of other Products (Dr. HD. Ruprecht, H. I. Sachs) 2.3.2.4 Folf finishing \$44 12.2.11 Annufacture ecial processes \$46 12.2.1.2 Applications ter 10 12.2.1.3 Applications 12.2.2.1 Annufacture 12.2.2.1 Manufacture 12.2.2.3 Applications 12.2.2.3 Applications Reaction Adbosives \$58 12.2.3 Applications 12.2.3.1 Manufacture 12.2.3.1 Annufacture 12.2.3.1 Annufacture 12.2.3.1 Manufacture 12.2.3.1 Applications 12.2.3.1 Applications 12.2.3.1 Manufacture 12.2.3.2 Applications 12.2.3.3 Applications 12.3.2 Properties 12.2.3.1 Applications 12.3.3 Applications 12.3.3 Applications 12.4.3 Applications 12.4.4 Manufacture 12.4.1 Manufacture 12.4.1 Manufacture 12.4.1 Manufacture 553 12.4.1 Manufacture 12.4.2 Properties 64 12.4.2 Properties 12.4.2 Properties 74 12.4.2 Properties of the reinforced plastic 754 12.4.2 Properties of the reinforced plastic 755 12.4.2 Pro	ation and base coating of leather	າຕ	12.1.2.2 Properties
2.3.2.3 Patent leather 544 12.2 Bonding 544 12.2 Bonding 544 12.2.1 Fedial processes 544 12.2.1 I 12.2.1 I 12.2.1 I 12.2.1 I 12.2.2 I 12.2.2 I 12.2.2 I 12.2.2 I 12.2.2 I 12.2.2 I 12.2.3 I 12.2.3 I 12.2.3 I 12.3.3 I 12.4.3 Bondin and processing 555 555 1 12.4 Sizings outs 555 554 I 12.4.3 I 12.4.2 I	2.3.2.3 Patent leather 544 12.2 Bonding of other Products (Dr. HD. Ruprecht, H. I. Sachis) 2.3.2.4 Foli Inishing 544 12.2.1 Mountacture ecial processes 546 12.2.1.2 Properties ter 10 12.2.1.3 Applications 12.2.2.1 Applications 12.2.2.1 Manufacture 12.2.2.1 Manufacture 12.2.2.2 Applications 12.2.2.2 Applications 12.2.3 Applications 12.2.3 Applications Reaction Adhesives 550 12.2.3 Applications 12.2.3 Applications 12.2.3 Applications 12.2.3 Applications step 12.2.3 Properties step 12.2.3 Properties step 12.2.3 Properties step 12.4.1 Manufacture step 12.4.2 Properties of the glass libers step 12.4.2 Properties of the plass libers step 12.4.2 Properties of the plass libers <t< td=""><td></td><td>3</td><td>12.12.3 Applications</td></t<>		3	12.12.3 Applications
2.3.2.4 Foil finishing 544 12.2.1 Fedial processes 544 12.2.1 12.2.2 1 12.2.2 1 12.2.2 1 12.2.2 1 12.2.2 1 12.2.2 1 12.2.2 1 12.2.3 1 12.2.3 1 12.2.3 1 12.3 1 12.3 1 12.4.1 1 12.3 Bondin and processing 550 12.3 1 12.4 Sizings outs 553 1 12.4 Sizings outs 554 12.4.1 1 12.4.	12.2.1 Kubbor 12.2.1 Manufacture 12.2.1 Manufacture 12.2.1 Applications 12.2.1 Applications 12.2.1 Applications 12.2.2 Rigid polyurchtane foam scrap 12.2.2.1 Manufacture 12.2.2.1 Manufacture 12.2.2.1 Applications 12.2.2 Applications 12.2.2 Applications 12.2.2 Applications 12.2.3 Applications 12.3.3 Applications 12.3.3 Applications 12.4.1 Manufacture 12.4.2 Properties 12.4.2			12.2 Bonding of other Products (Dr. HD. Ruprecht, H. I. Sachs)
ter 10 12.2.2 12.2.2 12.2.2 12.2.3 12.2.3 12.2.3 12.2.3 12.2.3 12.2.3 12.2.3 12.2.3 12.2.3 12.2.3 12.2.3 12.2.3 12.2.3 12.2.3 12.2.3 12.3.3 12.4.1 12.4.1 12.4.1 12.4.2 12.4.2 12.4.2 12.4.2 12.4.2 12.4.2 12.4.2 12.4.2 12.4.2 12.4.2 12.4.2 12.4.2 12.4.2	12.2.1.2 Properties 12.2.1.2 Properties 12.2.1.3 Applications 12.2.2 Rigid polyurethane foam strap 12.2.2 Properties 12.2.2 Properties 12.2.2 Properties 12.2.2 Properties 12.2.3 Applications 12.2.3 Applications 12.2.3 Inorganic products 12.2.3 Inorganic products 12.2.3 Inorganic products 12.3.3 Inorganic products 12.3.3 Properties 12.3.3 Applications 12.3.3 Ap	guinsin	4 4	
12.2.2 12.2.2 12.2.3 12.2.3 12.2.3 12.2.3 12.2.3 12.2.3 12.2.3 12.2.3 12.2.3 12.3.3 12.3.3 12.4.1 12.3 12.4.1 12.4	12.2.1.3 Applications 12.2.1.3 Applications 12.2.2 Rigid polyurethane foam scrap 12.2.2 Properties 12.2.2 Properties 12.2.2 Properties 12.2.3 Applications 12.3.4 Manufacture 12.2.3 Applications 12.3.4 Manufacture 12.2.3 Applications 12.3.4 Manufacture 12.3.4 Manufacture 12.3.4 Manufacture 12.4.1 Manufacture 12.4.1 Manufacture 12.4.1 Manufacture 12.4.1 Manufacture 12.4.1 Manufacture 12.4.1 Manufacture 12.4.2 Properties	100000000	+ 40	12.2.1.2 Properties
12.2.2 19.2.2 19.2.2 19.2.2 19.2.3 1	12.2.2 Rigid polyurethane foam scrap 12.2.2 Properties 12.2.2.1 Properties 12.2.2.2 Properties 12.2.2.2 Properties 12.2.3.1 Applications 12.3.3 Applications 12.3.3 Applications 12.3.3 Applications 12.3.3 Applications 12.3.3 Applications 12.3.3 Applications 12.4.1 Manufacture 12.4.2 Properties 12.4.1 Manufacture 12.4.1 Manufacture 12.4.1 Manufacture 12.4.2 Properties 12.4.2 Properties 12.4.3 Properties 12.4.2 Properties	•		
S48 12.2.3	12.2.2 Properties 12.2.2 Properties 12.2.2 Properties 12.2.2 Properties 12.2.3 Applications 12.4 Sizings for Class Fibors (Dr. R. Kubens) 12.4 Sizings for Class Fibors (Dr. R. Recker) 12.4 Sizings for Class Fibors (Dr. R. Cecker) 12.4 Manufacture 12.4 Sizings for Class Fibors (Dr. R. Cecker) 12.4 Sizings for Class Fibors (Dr. R. Cecker) 12.4 Manufacture 12.4 Sizings for Class Fibors (Dr. R. Cecker) 12.4 Sizings for Class Fibors (Dr. R. Cecker) 12.4 Manufacture 12.4 Sizings for Class Fibors (Dr. R. Cecker) 12.4 Sizings Fibors (Dr. R. Cecker)	S	-4	
Reaction Adhesives 548 12.2.3	12.2.3 Applications 548 12.2.3 Applications 548 12.2.3 Inorganic products 550 12.2.3 Inorganic products 12.2.3 Manufacture 12.2.3 Properties 550 12.3.3 Applications 551 12.4 Sizings for Glass Fibers (Dr. R. Rubens) 12.4 Sizings for Glass Fibers (Dr. R. Rubens) 12.4 Sizings for Glass Fibers (Dr. R. Rubens) 12.4 Sizings for Glass Fibers (Dr. R. Recker) 12.4.1 Manufacture 12.4.2 Properties		∞	12.2.2.2 Properties
Reaction Adhesives 548 12.2.3	12.2.3 Inorganic products 12.2.3 Inorganic products 12.2.3 Inorganic products 12.2.3 Manufacture 12.2.3 Applications 12.3.3 Applications 12.3.3 Applications 12.4.3 Applications 12.4 Sizings for Glass Fibors (Dr. R. Rubens) 12.4 Sizings for Glass Fibors (Dr. R. Rubens) 12.4 Sizings for Glass Fibors (Dr. R. Rubens) 12.4.1 Manufacture 12.4.2 Properties 12.4.2		∞	
Reaction Adhesives 550 s 550 n and processing 12.3 Bondin bonds 552 Reaction Adhesives 553 e terminated polyurchanes 553 s 554 s 12.4.1 s 553 s 12.4.1 s 554	12.2.3.1 Manufacture 12.3.1 Manufacture 12.3.2 Manufacture 12.3.2 Applications 12.3.3 Applications 12.3.3 Applications 12.3 Bonding of Foundry Sand (Dr. R. Kubens) 12.4 Sizings for Glass Fibers (Dr. K. Recker) 12.4.1 Manufacture 12.4.2.1 Properties 12.4.2.2 Proper			
550 12.3 Bondin 551 12.4 Sizings 12.4.1 12.4.1 12.4.1 12.4.2 12.4	12.3 Bonding of Foundry Sand (Dr. R. Kubens) 12.4 Sizings for Glass Fibors (Dr. R. Kubens) 12.4 Sizings for Glass Fibors (Dr. R. Recker) 12.4 Sizings for Glass Fibors (Dr. R. Recker) 12.4 Sizings for Glass Fibors 12.4 Sizi	so		12.2.3.1 Manufacture
551 12.3 Bondin 552 12.4 Sizings 12.4 Sizings 553 : 12.4.1 12.4.1 12.4 Sizings 12.4.1 12.4 Sizings 553 : 12.4.2 12	12.3 Bondin 552 12.4 Sizings 12.4 Sizings 12.4.1 12.4 Sizings 12.4.1 12.4 Sizings 12.4.1 12.4 Sizings 12.4.1 12.4.2 12.4.2 12.4.2 12.4.2 12.4.2 12.4.2 12.4.2 12.4.2 12.4.2 12.4.2 12.4.2 12.4.2 12.4.2 12.4.2 12.4.2 12.4.2 12.4.3 12.4.2 12.4.3 12.4.			12.2.3.3 Applications
552 12.4 Sizings 12.4.1 cs 553 12.4.1 12.4.2 Lichanes 554 12.4.1 554	12.4.1 Manufacture 12.4.2.1 Manufacture 12.4.2 Properties 12.4.2.1 Processing properties 12.4.2.1 Processing properties 12.4.2.2 Properties 12.4.2.2 Properties 12.4.2.2 Properties 12.4.2.2 Properties 12.4.2.2 Properties 12.4.2.3 Properties 12.4.2			12.3 Bonding of Foundry Sand (Dr. R. Kubens)
12.4.1	12.4.1 Manulacture			12.4 Sizings for Glass Fibors (Dr. K. Recker)
LETAL 253 LETAL 254 LETAL 254 LETAL 254 LETAL 254 LETAL 254 LETAL 2554 LETAL	12,42.1 Processing properties 12,42.2 Processing properties 12,42.2 Processing properties 12,42.3 Processing process			12.4.1 Manulacture
554	12.4.2.2 Properties of the glass fibers	cs	o 4	
			4	12.4.2.2 Properties of the glass libers
554				12.4.2.3 Properties of the reinforced plastic

14.2.3 Polyurchanes as waste product	-	580 Reference list for Chapter 14	582 582 583 583 584 584 585	586 586 587 587 589 589 589 590	592 592 593 593 593 595	. 598
13 Polyurethane Elastomeric Fibers	(Dr. H. Uali, Dr. NH. Wolf) 13.0 Introduction (Dr. H. Gall) 13.1.1 Reactions 13.1.2 Reactions 13.1.2 Preparation of NCO propolymers 13.1.2.2 Preparation of the elastanc solution 13.1.3.2 Modifying reactions 13.1.3.4 Adoistinked elastancs		13.3 Physical Crosslinking of Segmented Polyurea — Urethane Elastomers (Dr. KH. Wolf). 13.3.1 Influence of hard segments 13.4.2 Influence of the soft segments 13.4.1 Properties and Testing of Elastane Yarns (Dr. H. Gall) 13.4.1 Mechanical properties 13.4.2 Thermal behavior 13.4.3 Chemical characteristics	13.44 Coloration 13.5 Manufacture and Operations (Dr. H. Gull) 13.5.1 Types of yarn 13.5.2 Production and application of elastic fabrics 13.5.2.2 Woven fabrics 13.5.2.2 Woven fabrics 13.5.3 Dyeing and finishing 13.5.4 Characteristics of elastanc-containing fabrics Reference list for Chapter 13	14 Polyurethane and the Environment (L. Abele, Dr. FK. Brochhagen, U. Walber) 14.0 Introduction (Dr. FK. Brochhagen) 14.1 Industrial Hygiene in Manufacturing and Processing (U. Walber) 14.1.1 Regulations and guidelines 14.1.2 Regulations and guidelines 14.1.2.1 Solvent-free raw material systems — stationary processing	14.1.2.2 Solvent-free raw material systems — non-stationary processing

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2nd Edition

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meric foams of all types. In addition, individuals engaged in marketing of foams or foam raw materials will find this book of practical value. It can also be used as a textbook for a course on polymeric foams.

The editors hope that this book will stimulate creative thinking and development of new technologies, types of foams, processes, and applications.

Daniel Klempner

Vahid Scndijarevic

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Contents

Pr	face	Preface,	≅
	Intro	Introduction	~ 4
74	Fund 2.1 2.2 2.3 2.3 2.4 2.5	Fundamentals of Foam Formation 2.1 Introduction 2.2 Fundamental Principles of Foam Formation 2.2.1 Bubble Formation 2.2.1 Bubble Growth 2.2.3 Bubble Stability 2.3 Supporting Evidence from Specific Foam Systems 2.3.1 Principlastic Foams 2.3.2 Polyurethane Foams 2.3.3 Cellular Rubbor 2.4 Summary 2.5 References	888811171117
^k 9	3.1. 3.2. 3.4. 3.5. 3.5. 3.6.	is in the second	
	3.7	3.6.4 Microcells	m www

XII Contents

		3.7.1	Flexible Foamed Polymers.	38
		3.7.2	Rigid Foamed Polymers	39
	3,8	Cellul	Cellular Structure and Thermal Conductivity of Foamed Polymers	40
		3,8,1	Thermal Conductivity of the Polymer Phase	4
		3.8.2	Thermal Conductivity of the Gas Phase	41
		3.8.3	Radiative Thermal Conductivity	4
		3.8.4	Convective Thermal Conductivity	45
		3.8.5	Effects of Variables on the Thermal Conductivity	46
	3.9	General	ıl Concepts	47
		3.9.1	Three Generations of Polymer Foams	47
		3,9.2	Six Structural Levels	48
		3.9.3	Quantitative Parameters of Cellular Structure	49
		3.9.4	Technological Concepts	20
		3.9.5	Advantages of Foamed Polymers	51
	3.10		NOS	52
7	H	ihle Po	Flaviple Polumethane Roome	<i>y</i>
•	1 1	Table	LICHARE POSMS, more commenced and commenced	7.5
	ř	introd.	HITOGUCION	2
		1.1.	Applications	55
		4.	WATKEES	90
	7.		Chemistry	2/
		4.2.1	The Polymerization Reaction	56
		4.2.2	The Gas-Producing Reaction	9
		4.2.3	Foam Recipe Components	61
	4.3	-	2	77
			Review of Current Concepts	1.1
		4.3.2	Model for Flexible Foam Formation	%
	4,4	Prepar	Proparation of Flexible Foam	\$
		4.4.1	General Requirements	85
		4.4.2	Laboratory-Scale Cup-Foaming	86
		4.4.3	Laboratory Box-Foams	98
		4.4.4	Machine-Made Foam	87
		4.4.5	Mixing Heads	80
		4.4.6	Commercial-Scale Processes	68
	4.5		Physical Properties	94
		4.5.1	Foam Density	95
		4.5.2	Load Bearing	95
		4.5.3	Airflow	97
		4.5.4	Cell Size	25
		4.5.5	Compression Set	86
		456	Tension Pronerties	66
		457	Tear	6
		458	Resilience	100
	46	Slabetr	Tabstock Rooms	100
	2	46.1	State of Chamistry	100
		462	Albamotive Blowing Ament Dovolonmente	001
		463	High I and Bearing House	101
		464	High Regilions Rome	107
			TOT TOTAL TO	104

103 103 104 105 105 105 107 108 108	488333333333333333333333333333333333333	4
4.6.5 Foam Flammability 4.6.6 Non-BHT Foams 4.6.7 Enanations 4.6.8 Recycling 4.7.1 Seating Foams 4.7.2 Comfort 4.7.4 Fogging and Odor 4.7.4 Roferences 4.8 References	Rigid Polyurethane Foams 5.1 Introduction 5.2 Structure 5.3 Chemistry 5.4 Structure 5.4 Reactants 5.4.1 Isocyanates 5.4.2 Polyols 5.4.3 Catalysts 5.4.4 Subilizers 5.4.5 Equilizers 5.4.6 Combustion Modiflers 5.5 Formulations 5.6 Pour-in-Place 5.6.2 Pour-in-Place 5.6.3 Spray 5.6.3 Spray 5.8.1 Density 5.8.2 Mechanical Properties 5.8.3 Weechanical Properties 5.8.4 Thermal Conductivity 5.8.5 Combustibility 5.8.5 Combustibility 5.8.5 Applications 5.10.1 Rocyanates 5.10.2 Blowing Agents 5.10.4 Blowing Agents 5.11 Future Trends 5.12 References	Polyisocyanurate Foams
	ά	S

		Kinetics and Mechanisms of Cyclotrimerization	84		ì	7.5.10 Health and Safety Factors	224
"	623 Pmparet	6.2.3 Relative Catalytic Activity	92		0./	KELETENGES	7
,	1.15parat 6.3.1	Trethane-Modified Polyisocvanirate Foams	3 8	000		Polvolefin Foam	233
	_	Oxazolidonc-Modified Polyisocyanurate Foams	75		 	Introduction	233
	6.3.3	Amide-Modified Polyisocyanurate Foams	78		8.3	S	234
		Carbodinnido-Modified Polyisocyanurate Foams	78				237
	63.5	Imide-Modified Polyisocyanurate Foams	79		t	8.2.2 Foam Expansion with a Chemical Blowing Agent	3 5
4.	Applica	Applications	S 8		2	Properties and Their Relation to Structure	707
		Composite Foam Boards	08			• •	007
		Flame-Retardant Seamless Insulation [61]	Z.S.		¢.	8.5.7. Relationships Between Mituculte and Properties	707
		Building Insulation	78		4.	Commercial fronteness and frontessalg	32.5
		Chemical and Petrochemical Plant Insulation	83			6.4.1 EXELECTIVE TOURS	3 17
	6,4,5	High-Kise Building Walls	2 6				28.5
		Chemical-Kesistant Floats	ŝ				100
	6.4.7	Cryogenic, Petrochemical, and Solar Energy	8		0	. 6	288
			2 2		o O	Applications	0000
	6.4.8	Highly Kesilient Flexible Polyurethane Foams	ָּהָלָהָ מַלָּהָ			0.2.1 Tablibatottoms	2000
ŋ	Keteren	References	184		8.6	- 5	33
Volv.	tvrene	olystyrene and Structural Foam	68				
-	Introduc	Introduction and General Description.	681	-	PV	PVC Foams	301
	7 1 1	Nomencialities	06		9.1	Introduction	301
ç	Chemic	try and Prenaration	06		9.2	Characteristics of PVC	303
j	7.7.1	Day 50 25	01		!	9.5.1 PVC Structures	304
	14.1	riocess				9.2.2. Structure Changes During Processing	305
•		***************************************	2.5	•			202
(L)	Propert	Structure	561 561		0 3	٠,٠	305
		***************************************	2 .		?	3	205
		l Products	55.5			9.5.1 CVerview of Formulas for P.V. Foam.	200
			66				Š
	7.3.4	***************************************	2	***		,	308
			90:				317
	7.3.6	***************************************	.07			9.3.4 Design of Experiment (DOE) for Foam Formulation Development	318
	7.3.7	***************************************	.07		4.6	SS	370
		***************************************	.07				321
4	Comme	ocessing	08			•	328
	7.4.1		80:				329
		d Processes	.12				331
ij	Applica	***************************************	41.			9.4.5 PVC/Wood Flour Composite Foams	334
Į.	7.5.1		:15		9.5	Œ	335
	752		16				336
	753		217	_		9.5.2 ASTM and ISO Standards	340
	154	Athenius Components	219		9.6	8	341
	1111	Marina Amfratans	219				
	756	Haims Appucations	10		10 Epc	Epoxy Foams	347
	25.5	Space Filling and Reals	61.			Introduction	347
	; v c	Option I little and order more commenced to the Tiese	, C		10.	Epoxy Chemistry and Formulations	347
	0.5.7	Fineray Considerations in Foam Instillation	200		10.3	Blowing or Foaming Agents and Processes	349
	5.5	Elicibly Collaborations in the management with the services of	Ş				

XVI Contents

10.3.1 Inert Gas Blowing Agents	350		12.2.3 Preparation
10.00 Tank Thereigh Diamen A contra	350		12.3. Promertice and Their Relationship to Structure
men Liquid biowing	000		•
Reactive Blowing Ag	•		14.5.1 Dunchular regulars
10.3.4 Expanding Syntactic Fillers			
10.3.5 Frothed Epoxies	352		12.4 Commercial Production and Processing
10.3.6 Epoxy Emulsions			12,4,1 Metering
10 3.7 Non-Amenis Liquid Extractable Pore Formers and CIPS			12.4.2 Mixing
10.3 % Solid Extractable Pore Pormers			
10.3.9 Cheraclithomanhy	353		12.4.4 Equipment Selection
10.3 Combinations of Engaged Assessments Bosed Thermoseis	354		12 5 Applications
10.7 COLLIDITION OF LIPORY AND ISOCYANIAN DADOL MANAGEMANN TO THE TOTAL TO THE TANK	355		
10.5 Inferrase symmetries		*	10 & 1 Camer of Exam
10.6 Fiber-Keinforced Foams			14.0.4 I VIIIA VI VOMBERGEREN OF STATES DE ANGEL
10.7 Removable Foams			(2.2.3) Features of Micone Products
10.8 Applications			
10.3.1 Automotive (also See Adhesive Applications Below)			12,6 References
10.8.2 Electronics Financialation			
10.02 Adhanitas		,	13 Fluoropolymer Foams
10.6.2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2			• •
10.8,4 Building Keronning			10.1 Motory and Theorem December December 10.1 Alexander
10.8.5 Dams, Tanks and Bridgos			15.2. Chellinary and rights of right and discussions of the control of the contro
10.8.6 Expanding Cores			
1087 Snorts Equipment			13.3 Properties and Their Relation to Coll Structure
10.00 Dannanol Orne Dendische			13.3.1 Physical Properties.
TO D. M. M. Comment Cont. Description and Description	363		13.3.7 Thermal Properties
10.8.9 I hermoplashe Processing and recycling			10.00 Kindled 4.40 Williams
10,8.10 Lung Substitutes	. 363		13,3,3 opening real management of the second
10.9 References	. 363		
			13.4 Commercial Production and Processing
11 Later Ream and Shange			13.4.1 Foaming of FEP and PFA Resins
	367		13.4.2 Foaming of Fluoroelastomer Resins (such as Viton)
11.1 IIIIVOIDII manamanamanamanamanamanamanamanamanaman			13.4.3 Expansion of PTFF Rosin
11.2 Duniop Frocess			
11.2.1 Compounding Ingredients			(3.2) Applications
11.2.2 Processing Notes	. 370	ē 	13,6 References
11.2.4 Foarming	371		
(1.2 Erages Dronger			14 Wood Flour Composite Foams
11.0 110000 1100000 minimum b			
11.3.1 Original Freeze Process			14.1 Du outeblotterrantement of Dolomon's Commencer of the
11.3.2 Newer Freeze Process			
11,4 Sponge 374			14.1.2 Natural Flocis and Inch Froperius
11.4.1 Open-Cell Sponge Rubber			
11.4.2 Closed-Cell Sponge Rubber			
11 S References	378		14.2.1 Thermal Degradation of Natural Fibers
12 Silicone Foams			14.2.3 Dispersion of Natural Fiber and Fiber-Matrix Bonding
12 1 Background and Demolopm			14.2.4 Processing Difficulties Due to Increased Viscosity
12 1 Backmannd			14.3 Phase Changes in Foaming of PWC
16.1.1 David and an College Co	370		
12.1,2 Development of Silicone Foams	201		
12.1.3 Development of Flamo-Ketardant Foam Technology	. 501		14.3.9 Dolymer/Cas Solution Bormation
12.2 Chemistry and Preparation	. 561		
12.2.1 Foam Formation			
12.2.2 Optional Ingredients	381		14.3.4 Cell Growin Conirol

	14.4 Experiments and Discussion.	426 I7.3.4 Regulating
	14.4.1 Effects of Volatile Emissions from Wood Flour During	17.3.5 Microsphere
	Extrusion Processing	427 17.4 Syntactic Foam Prod
	14,4.2 Foaming Experiments with Varying Content of Extractives	
	14.4.3 Critical Processing Temperature in Extrusion Processing	17.4.2 Oligoester Sv
		434 17.4.3 Phenolic Syn
	14 A A Beaming with Venions OB As	777
		5÷17
	J4.5 Conclusions	
	14.6 References	443 17.4.6 Carbonized S
1		CAN TOTAL CAN THE CAN
7	Fueligie Foality	
	15.1 Chemistry and Foam Formation	17.5
	15.1.1 Phenolic Resins	
	16 1 2 C 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
	15.1.2. Crossiniking of Frenone Resins	
	15.1.3 Foam Formation	450 17.5.3 Thermal Prop
	15.1.4 Reduction in Corrosivity of Phenolic Foam	17.6 Recent Development
	15.) Properties and Their Relation to Structure	
		7.0.01
		7.6.7
	15.4 Applications	455 I7.6.3 Acrospace A
		17.6.4 Other Applic
		17 7 Dofores
ļ		1777
2		
	16.1 Introduction	457 18 Blowing Agents for Polyr
	16.2 The Combustion of Polymeric Foams	458 18 Introduction
	16.2.2. Smoldering Combustion of Polymeric Foams	18.3
	16,2,3 Filtration Combustion of Gases in Polymeric Foams	
	16.3 Test Methods and Fire Safety Classification Parameters	18.3.2
	of Foamed Materials for the Assessment of Fire Hazards	463 18,3,3 Organic Blov
	16,4 Recent Advances in Flame Retardancy of Polymetic Foams	18.3.4 Blowing Age
	16.4.1 The Develonment of Foams Based on Inherentiv	
	Thermally Stable and Hlame Perandant Polymers	18.3.5 Dractical City
	10.4,2 Chemical and Physical Modification of Polymetic Foams	18,4
	16.4.3 Additive Flame Retardants	18.4.1
	16.5 References	475 18.4.2 Volatile Liqu
		18.4.3 Solid Blowin
17	Syntactic Polymer Foams	18.5 Gases 546
	17.1 Introduction	18.6 Nuclearites
	17.2 Hollow Sphere Hillers	18.1
		2
	17.2.2 Class Microspheres	App
	17.2.3 Polymeric Microspheres	481 Letters of the Roman Alph
	17.2.4 Miscellancous Other Microspheres	482 Capital Greek Letters
	17.2.5 Macrospheres	1.0 Lower Case Greek Letters
	17.3 Syntactic Foam Processing	
	17.2.1	
		ddv
	17.3.3 Casting and Molding Compositions	483 Used in Describing the Ph

17.4	17.3.4 Regulating the Apparent Density	484 485 787
		488
	17.4.5 rachold Synacuc roams	489
		489
	17.4.6 Carbonized Syntactic Foams	489 199
		491
17.5	ದ	491
	17.5.1 Strength Properties	491
	17.5.2 Water Absorption and Kesistance to Hydrostatic Pressure	4 84
17.6	Recent	497
		497
		200
	17.0.3 Acrospace Applications	202
17.7		503
18 Blow	Rowing Agents for Polymeric Foams	505
• •	18.1 Introduction	505
18.2	Classification	505
18.3	Ç	507
	18.3.1 Main Characteristics	207
		505
	18.5.5 Urganic blowing Agents	7
		532
	18.3.5 Practical Guide for Selection of CBAs.	536
18.4	Physica	539
		539
		540
4	18.4.3	246
18.5	Gases	272
10.0		2 1
10.7	Kelefelices	ž
Appendix 1	Х 1	549
Lette	Letters of the Roman Alphabet	549
	Capital Oreck Letters	551
Š		5
Appendix 2	Z	552
	Conversion Factors between English and S.I. Only for Quantities [Teed in Describing the Physical Proporties of Foams	552